

REMARKS

INTRODUCTION

In accordance with the foregoing, claims 4, 8, and 14 have been amended. No claims have been canceled or added. No new matter is being presented, and approval and entry are respectfully requested.

Claims 4, 5, 7, 8, 13, and 14 are pending and under consideration. Reconsideration is respectfully requested.

EXAMINER INITIATED INTERVIEW

The Applicants thank the Examiner for the telephone interview of February 7, 2006. Comments regarding the prior art rejections where were discussed are included below.

OBJECTION TO THE CLAIMS

In the Office Action, at page 4, claims 4 and 14 were objected to for the reasons set forth therein. Amendments to claims 4 and 14 have been made. Therefore, reconsideration and withdrawal of the outstanding objections to the claims are respectfully requested.

REJECTION UNDER 35 U.S.C. §102

In the Office Action, at page 4, claim 8 was rejected under 35 U.S.C. §102(e) in view of U.S. Patent No. 5,987,591 issued to Jyumonji et al. The reasons for the rejection are set forth in the Office Action and therefore not repeated. Claim 8 has been amended for clarification. However, as the prior art may still relate to amended claim 8, this rejection is traversed and reconsideration is respectfully requested.

The rejection is respectfully traversed because Jyumonji fails to teach or suggest:

displaying the converted image data on a teaching pendant used for generating or editing a robot program and used for operating said robot,

wherein said displaying displays the image data and indication for manipulation for image processing simultaneously, or allows a user

to enter a switching mode or a superposition mode.

Specifically, the Applicants respectfully submit that Jyumonji fails to teach or suggest displaying converted image data on a teaching pendant used for generating or editing a robot program and used for operating said robot.

The Applicants also respectfully submit that moving a cursor to a position in an image does not equate to displaying image data and indication for manipulation for image processing. Accordingly, the Applicants respectfully submit that Jyumonji cannot be relied upon for teaching or suggesting displaying image data and indication for manipulation for image processing simultaneously, or allowing a user to enter a switching mode or a superposition mode.

The Applicants respectfully submit that since Jyumonji fails to teach or suggest all of the features of claim 8, this claim is allowable over Jyumonji. Thus, withdrawal of the 102 rejection is respectfully requested.

REJECTION UNDER 35 U.S.C. §103 OF CLAIMS 4, 5, 7 AND 13

In the Office Action, at page 5, claims 4, 5, 7 and 13¹ were rejected under 35 U.S.C. §103(a) as being unpatentable over Jyumonji. The reasons for the rejection are set forth in the Office Action and therefore not repeated. The rejection is traversed and reconsideration is requested.

Claim 4 Patentably Distinguishes Over Jyumonji

Regarding claim 4, the rejection is respectfully traversed because Jyumonji fails to teach or suggest:

said teaching pendant comprises a unit for generating or editing a robot program, a unit for operating the robot, and a display unit, and can display on the display unit the converted image, and comprises a unit used for manipulation for image processing; and
said display unit displays an indication for generating or editing of the robot program and an indication for manipulation of image processing, together with an image simultaneously, or allows a user to select either a switching mode or a superposition mode.

To establish a *prima facie* case of obviousness, the prior art reference must teach or suggest all the claim limitations. *Manual of Patent Examination Procedure (MPEP)* § 2142. The

¹ Both the previous Office Action and the current Office Action mention claims "4-5, 7 and 14." However, it

Examiner admits that Jyumonji fails to teach or suggest a teaching pendant comprising a unit used for manipulation for image processing. Accordingly, the Applicants respectfully submit Jyumonji cannot individually be relied upon to establish a prima facie case of obviousness.

Further, as discussed above with respect to claim 8, Jyumonji cannot be relied upon for teaching or suggesting displaying an indication for manipulation of image processing together with an image simultaneously. Accordingly, claim 4 is deemed to be allowable over the art of record. Therefore, withdrawal of the §103 rejection is respectfully requested.

Claims 5, 7, and 13 Depend From Patentably Distinct Independent Claims

Regarding the rejection of claims 5, 7, and 13, these claims depend directly on independent claim 4, and are therefore believed to be allowable for at least the reasons noted above.

REJECTION UNDER 35 U.S.C. §103 OF CLAIM 14

In the Office Action, at page 8, claim 14 was rejected under 35 U.S.C. §103 as being unpatentable over Jyumonji in view of U.S. Patent No 6,362,813 issued to Wörn. The reasons for the rejection are set forth in the Office Action and therefore not repeated. The rejection is traversed and reconsideration is requested.

Claim 14 Patentably Distinguishes Over Jyumonji and Wörn

In the Office Action, at page 8, the Examiner states:

The arguments in paragraph 9 above as to the applicability of Jyumonji are incorporated herein.

With regard to Claim 14, the only unaddressed limitation is "a display unit can display an image processing manipulation menu."

However, as discussed above with respect to claim 8, Jyumonji does not teach or suggest a display displaying an indication for manipulation of image processing, together with the image of the robot simultaneously. The Applicants respectfully submit that Wörn fails to make up for this deficiency. Accordingly, the Applicants respectfully submit that the proposed combination of Jyumonji and Wörn cannot be relied upon for teaching or suggesting:

said display unit displays an indication for generating or editing of the robot program and an indication for manipulation of image

seems clear from the substance of the Office Actions that the Examiner intended claims 4, 5, 7 and 13.

processing, together with the gray scale or color scale visual image of the robot simultaneously and allows a user to select between using the pendant for image processing teaching and robot teaching/control.

Further Applicants representative has been advised that Wörn does not disclose that the computer 4 carries out "image processing" for control of the manipulator 2, so it is not conceivable that the display screen 12 of the programming device 10 is used for displaying for operations of image processing.

Accordingly, claim 14 is deemed to be allowable over the art of record. Therefore, withdrawal of the §103 rejection is respectfully requested.

No Suggestion Or Motivation To Combine The Reference Teachings

The Applicants respectfully submit that the Office Action fails to provide a valid line of reasoning from the prior art to combine the teachings of Jyumonji and Wörn. Rather, the Office Action states at page 8:

At the time the invention was made, it would be reasonable for a person of ordinary skilled in the art to assume that the computer controls the robot contains an image processing manipulation menu, which in Wörn will be displayed on the programming device. And a person of ordinary skilled in the art would be motivated to incorporated such functionality into Jyumonji's teaching control panel because Wörn teaches it is desirable to have more extensive display possibilities on a portable control panel, column 1, line 60.

The Applicants respectfully submit that this, at best, amounts to an improper hindsight reconstruction of the invention. Accordingly, withdrawal of the 103 rejection is respectfully requested.

CONCLUSION

In accordance with the foregoing, it is respectfully submitted that all outstanding objections and rejections have been overcome and/or rendered moot. And further, that all pending claims patentably distinguish over the prior art. Thus, there being no further outstanding objections or rejections, the application is submitted as being in condition for allowance which action is earnestly solicited.

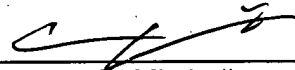
If the Examiner has any remaining issues to be addressed, it is believed that prosecution can be expedited by the Examiner contacting the undersigned attorney for a telephone interview to discuss resolution of such issues.

If there are any underpayments or overpayments of fees associated with the filing of this Amendment, please charge and/or credit the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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